
From: Haagenstad, Mark P
Sent: Wednesday, August 13, 2014 11:29 AM
To: Kieling, John, NMENV; Pullen, Steve, NMENV; Hall, Timothy, NMENV
Cc: Brandt, Michael Thomas; Sharp-Geiger, Raeanna Racine; Dorries, Alison Marie; Grieggs, Tony; Mousseau, Jeffrey David; Torres, Enrique; George, Victoria A; Turner, Gene E; Maggiore, Peter; Nickless, David J; Vigil-Holterman, Luciana R; Schumann, Paul B; Bacigalupa, Gian A; Diaz, Tammy; Martinez, Angela M; Thorp, Donald Thomas; McMichael, Susan Lynn; Cummings, Lisa K; Woitte, Deborah Kay
Subject: RE: Notification of Waste Profile Discrepancy Application of EPA Haz Waste Number D001
Attachments: ADESH-14-041-J R Stroble Written Concurrence for Correction of Waste Manifests.pdf

[See attachment.](#)

From: Haagenstad, Mark P
Sent: Wednesday, August 13, 2014 11:28 AM
To: Kieling, John, NMENV; 'Pullen, Steve, NMENV'; Hall, Timothy, NMENV
Cc: Brandt, Michael Thomas; Sharp-Geiger, Raeanna Racine; Dorries, Alison Marie; Grieggs, Tony; Mousseau, Jeffrey David; Torres, Enrique; George, Victoria A; 'Turner, Gene E.'; 'Maggiore, Peter'; Nickless, David J; Vigil-Holterman, Luciana R; Schumann, Paul B; Bacigalupa, Gian A; Diaz, Tammy; Martinez, Angela M; Thorp, Donald Thomas; McMichael, Susan Lynn; 'Cummings, Lisa'; Woitte, Deborah Kay
Subject: Notification of Waste Profile Discrepancy Application of EPA Haz Waste Number D001

Dear Mr. Kieling:

Subject: Notification of Waste Profile Discrepancy Regarding Application of EPA Hazardous Waste Number D001 to Nitrate-Salt-Bearing Waste Containers Shipped Off-Site From Los Alamos National Laboratory

The purpose of this email is to notify the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) of a waste characterization discrepancy as required by the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). Section 2.4.7, Waste Characterization Review, of the Permit states that the Permittees shall "... (4) [R]echaracterize a hazardous waste stream whenever the Permittees are notified by a receiving off-site facility that the characterization of a hazardous waste they obtained from the Permittees' Facility does not match a pre-approved waste analysis certification or accompanying waste manifest or shipping paper. The Permittees shall notify the Department in writing within three days of their receipt of the notice of the discrepancy from a receiving facility."

The Department of Energy and Los Alamos National Security, LLC (DOE/LANS) (the Permittees) shipped nitrate-salt-bearing waste containers to the Waste Isolation Pilot Plant (WIPP) since 2011. Additional shipments of this waste stream were made to Waste Control Specialists (WCS) in Andrews, Texas, and the Idaho National Laboratory.

Since that time, the LANL and WIPP Permittees have each made the decision to add the Environmental Protection Agency (EPA) Hazardous Waste Number D001 for ignitability to the LANL nitrate-salt-bearing waste containers at their respective facilities. As a result, the characterization of the containers WIPP received from LANL no longer matches the pre-approved waste analysis certifications that accompanied the waste manifests and shipping papers associated with the original off-site shipments.

Based on the DOE/LANS' written concurrence allowing WIPP to correct the original manifests (see attached notification), the Permittees are hereby notifying the Department of the newly-identified discrepancy, in accordance with Permit Section 2.4.7(4). This email constitutes notification with respect to the wastes associated with the referenced manifests.

If you have comments or questions regarding this notification, please contact Gene E. Turner (DOE) at (505) 667-5794 or me at (505) 665-2014.

Mark Haagenstad
Environmental Protection Division
RCRA Permitting and Compliance Team Leader
Los Alamos National Security
Los Alamos National Laboratory
Office: (505) 665-2014
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Associate Director for ESH
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National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 667-5794/Fax (505) 667-5948

Date: **AUG 13 2014**
Ref: ADESH-14-041

J. R. Stroble, Acting Assistant Manager
Office of Program Management
Carlsbad Field Office
U. S. Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dear Mr. Stroble,

Subject: Written Concurrence for Correction of Waste Manifests

The purpose of this letter is to follow up our recent conversation regarding a discrepancy on manifests for containers (see attachment) that were shipped from the Los Alamos National Laboratory (LANL) to the Waste Isolation Pilot Plant (WIPP). The containers were received at the WIPP facility between August 8, 2013, and January 29, 2014, in shipments associated with 49 separate manifests (see attachment). WIPP accepted the shipments for disposal, and the manifests were returned to LANL without any discrepancies identified. Due to recent events at WIPP, and re-evaluation of Acceptable Knowledge information, the Carlsbad Field Office (CBFO) notified LANL that there was a manifest discrepancy based on WIPP's determination that nitrate salt-bearing waste containers required application of the EPA Hazardous Waste Number D001 and DOT subsidiary Hazard Division 5.1. Further, CBFO requested concurrence from LANL that the manifests can be corrected pursuant to Section C-5b(1) of the WIPP Waste Analysis Plan (the WAP) which provides that errors on a manifest can be corrected by WIPP with a verbal (followed by a mandatory written) concurrence by the generator/storage site technical contact. This letter provides that written concurrence.

At the time LANL shipped the containers to WIPP, the manifests identified the hazardous waste numbers and hazard class determined to be appropriate at that time based on acceptable knowledge. Due to the recent events at WIPP, LANL has been re-evaluating the characterization of the waste stream. On July 30, 2014, the Department of Energy, National Nuclear Administration (DOE/NNSA) and Los Alamos National Security, LLC (LANS) notified the New Mexico Environment Department that LANL had decided to provisionally apply EPA Hazardous Waste

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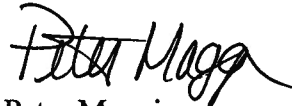
Number D001 for the characteristic of ignitability to certain nitrate salt-bearing waste containers stored at LANL.

We are continuing to re-evaluate the waste characterization information concerning these nitrate salt waste streams, and will keep you updated as to new relevant information. If you have questions please contact Michael Brandt (LANS) at (505) 667-4218, or Pete Maggiore (DOE) at (505) 665-5025.

Sincerely,



Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety, and Health
Los Alamos National Security, LLC



Peter Maggiore
Assistant Manager
Environmental Projects Office
Los Alamos Field Office

Enclosures: (1) List of Manifests Requiring Correction

Cy: Kimberly Davis Lebak, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
Gene E. Turner, NA-LA, (E-File)
Kirsten M. Laskey, NA-LA, (E-File)
Eric L. Trujillo, NA-LA, (E-File)
Carl A. Beard, PADOPS, (E-File to aosburn@lanl.gov)
Michael T. Brandt, ADESH, (E-File)
Raeanna R. Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Jeffery D. Mousseau, ADEP, (E-File)
Daniel R. Cox, ADEP, (E-File)
Victoria A. George, REG-DO, (E-File)
Anthony R. Grieggs, ENV-CP, (E-File)
Deborah K. Woitte, LC-ESH, (E-File)
Debra Nevergold, LTP, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Luciana Vigil-Holterman, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatsteam@lanl.gov, (E-File)

**List of applicable manifest numbers, shipment numbers, dates of receipt and container numbers
from
Waste Stream LA-MIN02-V.001**

Manifest Number	Shipment Number	Received	Container Number	Container Count
001600826GBF	IN130186	8-Sep-13	LA00000062547	1
001600826GBF	IN130186	8-Sep-13	LA00000063116	2
001600826GBF	IN130186	8-Sep-13	LA00000063198	3
001600826GBF	IN130186	8-Sep-13	LA00000063497	4
001600826GBF	IN130186	8-Sep-13	LA00000064665	5
001600826GBF	IN130186	8-Sep-13	LA00000064863	6
001600826GBF	IN130186	8-Sep-13	LAS822714	7
010784176JJK	LA130125	29-Aug-13	LA00000092217	8
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010784176JJK	LA130125	29-Aug-13	LA00000092347	10
010784176JJK	LA130125	29-Aug-13	LA00000092555	11
010784176JJK	LA130125	29-Aug-13	LA00000093588	12
010784176JJK	LA130125	29-Aug-13	LA00000093589	13
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010784180JJK	LA130129	4-Sep-13	LA00000092140	15
010784180JJK	LA130129	4-Sep-13	LA00000092219	16
010784180JJK	LA130129	4-Sep-13	LA00000092235	17
010784180JJK	LA130129	4-Sep-13	LA00000092495	18
010784180JJK	LA130129	4-Sep-13	LA00000093597	19
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010784182JJK	LA130131	6-Sep-13	LA00000092239	26
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010784238JJK	LA130179	3-Dec-13	LA00000092672	227
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